EXHIBIT A

·	ORIGINAL	
	ONAL	PLD-PI-001
ATTORNEY OR PARTY WITHOUT ATTORNEY (Eric A. Woosley (SBN)	Name, State Bar number, and address):	FOR COURT USE ONLY
LAW OFFICES OF WOOSLI	EY & PORTER	1 17730
1602 State Street		2-01/9
Santa Barbara, CA 9		901/
TELEPHONE NO: 805-897-3		1
ATTORNEY FOR (Name): VALERIE SUPERIOR COURT OF CALIFORNIA	ORFMAN and DAVID DORFMAN	
	11 Street P30:09 / 23 / 2016 TRIAL: 10 / 1	I note non A L A A 1 SARO
		11 20 to 030; 4 4 1 1 0 1 mile.
cmy and zip code: Los Ange:	,	
PLAINTIFF: VALERIE	ORFMAN, DAVID DORFMAN and ROBERT	FILED
DORFMAN, Deceased, by Interest, VALERIE DO	and through his Successor in	Superior Court of California County of Los Angeles
DEFENDANT: MASSACHU	SETTS CASUALTY INSURANCE COMPANY, a	
business entity, for	n unknown	APR 10 2015
1 DOES 1 TO 100	FNC/USIVE	Sherri R. Carter, Exacutive Officer/Clerk
	y, Property Damage, Wrongful Death	By Myrna Beltran Deputy
Type (check all that apply):	BY FAX	DAS
MOTOR VEHICLE	X OTHER (specify):	HOLLARD L. HALM
Property Damage Personal Injury	X Wrongful Death X Other Damages (specify): BAD FAITH;	HOWARD C. HARLY
INTENTIONAL INFLICTI	ON OF EMOTIONAL DISTRESS	
Jurisdiction (check all that app ACTION IS A LIMITED CI	F*	CASE NUMBER:
Amount demanded	does not exceed \$10,000	
ACTION IS AN UNLIMITE	O civil CASE (exceeds \$25,000)	BC578402
ACTION IS RECLASSIFIE	D by this amended complaint	
from limited to unli	1	
1. Plaintiff (name or names):V2	LERIE DORFMAN, DAVID DORFMAN, ROBERT D	OORFMAN, deceased, by and
alleges causes of action again	sor in Interest, VALERIE DORFMAN st defendant (name or names): MASSACHUSETTS CASU	ALTY INSURANCE COMPANY
and DOES 1 through 2. This pleading including attack	100, inclusive ments and exhibits, consists of the following number of pages:	
3. Each plaintiff named above is	-	
a. except plaintiff (name	1 *	
(2) an unincorpora	alified to do business in Califomia ed entity (describe):	
 (3) a public entity (
	an adult guardian or conservator of the estate or a guardian ad litem ha	s been appointed
(b) other (spec	fy):	
(5) other (specify):		CIT/ LEA/ RECE PAYM PAYM RECE
b. except plaintiff (nan	e):	CIT/CASE: LEA/DEF#: RECEIPT # DATE PAID PAYMENT: RECEIVED: CHE CAS CHA CAR
	alified to do business in California ed entity (describe):	CASE: DEF#: DEF#: IPT #: PAID: ENT: CHECL CASH CHAN CARD
(3) an unincorporal		
(4) a minor	an adult guardian or conservator of the estate or a guardian ad litem ha	BC578402 CCH28019 04/10/15 \$435,00 K: 6E:d 6E:d
(a) for whom a	7	BC578402 CCH28019 04/10/15 435.00 :
(5) other (specify):		15 22
	 	oment 3
	onal plaintiffs who are not competent adults is shown in Attach	Page 1 of 3
Form Approved for Optional Use Judicial Council of California	COMPLAINT—Personal Injury, Property	Legal Code al Civil Procedure, 5 425.12

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			· · · · · · · · · · · · · · · · · · ·	PLD-PI-001
SHORT TITLE: DORFMAN v. M	ASSACHUSETTES CASUALTY		CASE NUMBER:	
4. Plaintiff (name):			L,	
	he fictitious name (specify):			
and has complied with th	e fictitious business name laws.			
Each defendant named above X except defendant (n CASUALTY INSURANCE	e is a natural person ame): MASSACHUSETTS c.	except defendant (name):	
		(4) [
(1) a business orga (2) X a corporation	nization, form unknown	(1) a business orga (2) a corporation	nization, form unknown	1
	ed entity (describe):		ed entity (describe):	
(4) a public entity (lescribe):	(4) a public entity (6	describe):	
(5) ather (specify):		(5) other (specify):	•	
b. except defendant (name): d.	except defendant	(name):	,
(1) a business orga	nization, form unknown	(1) a business orga	nization, form unknowr	1
(2) a corporation		(2) a corporation		
(3) an unincorporat	ed entity (describe):	(3) an unincorporat	ed entity (describe):	
(4) a public entity (describe):	(4) a public entity (describe):	
(5) other (specify):		(5) other (specify):		
information about addit	ional defendants who are not natural p	ersons is contained in Atta	schment 5:	
a. X Doe defendants (sp	s sued as Does are unknown to plainti acify Doe numbers): 1-50 and acted within the scope of that ager	were the ag	ents or employees of o	ther
	ecify Doe numbers): 50~100		whose capacities are	unknown to
plaintiff. 7. Defendants who are join	ned under Code of Civil Procedure sec	tion 382 are (names):		
7. Detendants who are jou	THE STREET COLOR OF CHER PROCESSION BEC	, and the firm of		
8. This court is the proper court				
	ant now resides in its jurisdictional area of business of a defendant corporation		tion is in its jurisdictions	al area.
c. X injury to person or d	amage to personal property occurred i	•	•	
d other (specify):				
	omply with a claims statute, and		,	
	pplicable claims statutes, or nplying because (specify):			

•	,	
		PLD-PI-001
SHORT TITLE: DORFMAN V	MASSACHUSETTES CASUALTY	CASE NUMBER:
10. The following causes of acticauses of action attached): a. Motor Vehicle 10. The following causes of action attached: 11. Motor Vehicle	on are attached and the statements above apply to each (each co	mplaint must have one or more
b. General Negligenc c. Intentional Tort d. Products Liability e. Premises Liability	e	
	VRONGFUL DEATH; BAD FAITH; INTENTIONAL INFLICTI	ON OF EMOTIONAL DISTRESS
11. Plaintiff has suffered a. X wage loss		
a. X wage loss b. loss of use of prop c. X hospital and medic d. X general damage		
e property damage f loss of earning cap gx other damage (spe	acity cify): Death of spouse and father	
•		
a. Ilsted in Attachmer b. X as follows; Plaintiff Valerie Dorfman is are for loss of financial support and the reasonable value of h	of for wrongful death and the relationships of plaintiff to the deceant 12. the widow of Robert Dorfman. Plaintiff David Dorfman is the son of Robert loss of gifts and benefits Plaintiffs would have received from Robert louschold services that Robert Dorfman would have provided. In additionanionship, comfort, care, assistance, protection, affection, society, moral	bert Dorfman. The damages claimed Dorfman, funeral and burial expenses, n, Plaintiffs claim damages for loss of
•	plaint is within the jurisdiction of this court.	
a. (1) X compensator (2) X punitive dam	ages	
The amount of damages (1) X according to (2) in the amoun		(1)):
15. The paragraphs of thi	s complaint alleged on information and belief are as follows (spec	ify paragraph numbers):
Date: April 10, 2015		
Eric A. Woosley (TYPE OR PRINT N	ME) (SIGNATURE	E OF PLAINTIFF OR ATTORNEY)
LD-PH001 [Rev. January 1, 2007]	COMPLAINT—Personal Injury, Property Damage, Wrongful Death	Page 3 of 3

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		PLD-PI-001(3
SHORT TITLE: DORFMAN	v. MASSACHUSETTES CASUALTY	CASE NUMBER
First ·	CAUSE OF ACTION—Intentional Tort	Page 4
(number)	BAD FAITH	
	Complaint Cross-Complaint	
(Ose a separate cause of	ection form for each cause of action.)	
Interest, V	ROBERT DORFMAN, by and through his Success ALERIE DORFMAN Mant(name): MASSACHUSETTES CASUALTY INSURANC	
X Does	1 to 100	
intentionally caus on (date): Apr	priximate) cause of damages to plaintiff. By the following acts ed the damage to plaintiff il 12, 2013 Angeles, California	or omissions to act, defendant
1.Plaintiff	asons for Hability): Robert Dorfman was in a contractual relates assachusetts Casualty Insurance Company [tionship with "Massachusetts"].
Defendant M and prolong accepting t buy out the paying the Defendant M engaged in Robert Dorf	policy from Plaintiff Robert Dorfman, ramonthly benefits. Plaintiff Robert Dorfman assachusetts offer. Defendant Massachuse abusive practices and conduct, directed to man, including refusing to pay contracted	nied the claim, s, before setts sought to ther than continue an declined tts thereafter owards Plaintiff for annual
examination any cause, retained ps Plaintiff R vehicle, se Dorfman's hand posting home, dispacommunity, changed his	repeatedly scheduling and then cancelling as tacit threats to cut off disability repeatedly requiring interviews with Mass ychiatrist, who in turn fabricated claims obert Dorfman, vandalizing Plaintiff Roberding investigators to sit outside of Place, sending persons to photograph Plaint private medical information on the door raged Plaintiff Robert Dorfman to others and interfered with Plaintiff Robert Dorfman's referee, all to impair Robert Dorfman's refereed.	benefits without achusetts' concerning rt Dorfman's intiff Robert iff and his home, of Plaintiff's in the medical man's ability to
3.Massachus conduct cau anxiety, hu directly an	s for which he had contracted. ett's intentionally abusive practices and sed severe emotional distress, nervousnes miliation, fear, and ordeal to Plaintiff proximately causing Plaintiff Robert Do as been damaged in an amount to be proven	s, worry, stress, Robert Dorfman, rfman's death.

Form Approved for Optional Use Judicial Council of California PLD-PI-001(3) [Rev. January 1, 2007]

CAUSE OF ACTION—Intentional Tort

Legal Solutions Q Plus Code of Civil Procedure, § 425.12

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SHORT TIT	LE: DORFMAN		ALTY	CASE NUMBER
Se	cond	CAUSE OF ACTION	Intentional Tort	Page 5
ATTA	(number)	Complaint Cross-Complaint		ICTION OF EMOTIONAL
		action form for each cause of action.	12 NE (KEE Y)	
iT- 1.		ROBERT DORFMAN, by and	through his Sucesse	or in Interest,
	VALERIE DOR alleges that defen	EMAN Idant (name): MASSACHUSETTE	S CASUALTY INSURANCE	CE COMPANY
	•			
			٠	
	X Does	1 to 100		
		roximate) cause of damages to pl	aintiff. By the following acts	or omissions to act, defendant
		ed the damage to plaintiff		
	at (place): Los	Angeles California		
	(description of rea	sons for liability): Robert Dorfman was in	a contractual rela	tionship with
		assachusetts Casualty 1		
		Robert Dorfman became		
		essachusetts. Defendared payment of the claim	nt Massachusetts dem n for several month	•
	accepting th	he claim. Thereafter,	Defendant Massachu	setts sought to
		policy from Plaintiff monthly benefits. Plan		
	Defendant M	assachusetts offer. De	efendant Massachuse	tts thereafter
		abusive practices and oman, including refusing		
	increases,	repeatedly scheduling a	and then cancelling	medical
		s as tacit threats to or repeatedly requiring in		
	retained ps	ychiatrist, who in turn	n fabricated claims	concerning
		obert Dorfman, vandaliz		
		ome, sending persons to		
		private medical inform		
		naged Plaintiff Robert and interfered with Pla		
	changed his	career, all to impair s for which he had cont	Robert Dorfman's r	
		ett's intentionally abo		
		sed severe emotional di miliation, fear, and or		
	directly and	d proximately causing I	Plaintiff Robert Do	rfman's death.
	Plaintiff ha	as been damaged in an a	amount to be proven	at time of trial.

Form Approved for Optional Usa Judicial Council of California PLD-PL001(3) [Rev. January 1, 2007]

CAUSE OF ACTION—Intentional Tort

Legal Solutions G. Plus Code of Civil Procedure, § 425.12

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			PLD-PI-001
HORT TITL	E: DORFMAN	7. MASSACHUSETTES CASUALTY	CASE NUMBER
Thi	(number)	CAUSE OF ACTION—Intentional Tort	Page 6
ΑΤΤΑ		WRONGFUL DEATH	
		action form for each cause of action.)	
	•	·	
IT- 1.	Plaintiff (name): V	ALERIE DORFMAN and DAVID DORFMAN	
	alleges that defend	ant (name): MASSACHUSETTES CASUALTY INSURANC	E COMPANY
			•
	[¥] Does	1 to 100	
			or omissions to and defaud
		oximate) cause of damages to plaintiff. By the following acts d the damage to plaintiff	or omissions to act, defend
	on (date): Apri		
	at (piace): Los	Angeles, California	
	(description of reas	• • • • • • • • • • • • • • • • • • • •	
		Massachusetts, through is abusive practic luding but not limited to refusing to pay	
		ases, repeatedly scheduling and then can	
	examinations	as tacit threats to cut off disability b	enefits without
		epeatedly requiring interviews with Massa	
		chiatrist, who in turn fabricated claims bert Dorfman, vandalizing Plaintiff Rober	
		ding investigators to sit outside of Plai	
		me, sending persons to photograph Plainti	
		private medical information on the door of	
	home, dispar	aged Plaintiff Robert Dorfman to others i	n the medical
		nd interfered with Plaintiff Robert Dorfm career, all to impair Robert Dorfman's ri	
		for which he had contracted, directly an	
		ntiff Robert Dorfman's death.	,
	2.Plaintiff	Valerie Dorfman ("Valerie") is the widow	of Robert
		aintiff David Dorfman ("David") is the ac	
	Dorfman.		
	3 Plaintiffs	Valerie and David claim damages as a res	sult of Defendant
		s' intentionally abusive practices and ha	
	for loss of	financial support, loss of gifts and bene	fits Plaintiffs
		eceived from Robert Dorfman, funeral and	
		onable value of household services that I	
		rovided. In addition, Plaintiffs claim or rfman's love, companionship, comfort, can	
		affection, society, moral support, and his	
		l in amounts to be proven at time of tria	
Form App	roved for Optional Use	CAUSE OF ACTION (standard Total T	Page 1 o
Judicial	Council of California (3) [Rev. January 1, 2007]	Sol	itions Plus
	Tot (may, sentery 1, 2007)	$oldsymbol{Q}$	h Pius

		1	PLD-PI-001(6)
IORT T	TITLE: DORFMAN	v. MASSACHUSETTES CASUALTY	CASE NUMBER
		Exemplary Damages Attachment	Page 7
ATT	ACHMENT TO	Complaint Cross-Complaint	
EX-1	. As additional dam and DOES 1	ages against defendant (name): MASSACHUSETTS CASUALT through 100	Y INSURANCE COMPANY
		fendant was guilty of	
	X malice X fraud	·	
	X oppression	Cade costler 2204, and plaintiff should recover, in addition to active	ol damagas, damagas
		Code section 3294, and plaintiff should recover, in addition to actu- ble of and to punish defendant.	ai uzinages, uantages
EX-2		ng plaintiffs claim are as follows:	
	Dorfman, is conduct descundertaken w	bert Dorfman, by and through his Successo informed and believes, and thereon allege ribed herein was intended by Defendants t with the knowledge that injury and damages likely, such that the conduct was despice	, that Defendants' o cause injury, or was to Robert Dorfman was
	Defendants w Dorfman, sub disregard of	with a willful and conscious disregard of jected Robert Dorfman to cruel and unjust his rights, or to otherwise cause his in alice, oppression, and/or fraud under Cal	the rights of Robert hardship in conscious jury, so as to
	3294, as set entitling Pl	forth in the First and Second Causes of aintiff to punitive damages in an amount ample of Defendants.	Action, thereby
	Dorfman, is Defendants' the employee conscious di authorized of	bert Dorfman, by and through his Successon further informed and believes, and thereo officers, directors and/or managers, had and agents who committed the acts and exergard of the rights of Plaintiff Robert ratified those employees' and agents' and their conduct or remediate their conductor	on alleges, that advance knowledge of mployed them with a Dorfman and/or acts by failing to take
		emplary damages sought is_	
EX-3	a. X not show	n pursuant to Code of Civil Procedure section 425.10.	
EX-3	b. 🔲 \$	·	Page 1 of 1